APPENDIX "B"

TENNESSEE HISTORICAL COMMISSION
REVIEW AND COMPLIANCE SECTION
REPORTING STANDARDS

ARCHAEOLOGICAL AND ARCHITECTURAL
RESOURCE IDENTIFICATION STUDIES (SURVEY REPORTS)

Since 1969, federal undertakings in Tennessee reviewed under Section 106 of the National Historic Preservation Act have necessitated a large number of archaeological and architectural survey reports. The reports are prepared either by in-house cultural resource management specialists on the staff of federal agencies or by in-house staffs of their applicant agencies, or by private consultants under contract to federal agencies or applicants. One notable characteristic of these reports is their wide variation in quality, content, and description of work conducted, and a frequent failure to include specific information which is necessary for successful completion of the Section 106 process. This has indicated a need for a clear and concise statement of exactly what kinds of information should be presented in a cultural resource identification study so that the reports can be used effectively to facilitate federal agency decision making and as well as comparative research with reference to cultural resources. In each state, the State Historic Preservation Office (SHPO) is charged with the responsibility of coordinating state and federal cultural resource surveys as well as review responsibilities for surveys done in conjunction with National Historic Preservation Act and National Environmental Policy Act compliance. In fulfillment of this responsibility, and in recognition of the need expressed above, the Tennessee Historical Commission, as Tennessee SHPO has prepared the following reporting standards and guidelines for cultural resource survey reports resulting from federal undertakings.

In recent years, federal agencies have become more attentive to their legal obligations relative to compliance with the National Historic Preservation Act (PL 102-575), the Archaeological and Historic Preservation Act (PL 93-291), and the National Environmental Policy Act (PL 91-190). Consequently, it has become ever more important that cultural resource consultants fully understand the technical requirements of preservation law so that they can provide the best service to their clients and can help protect cultural resources using the letter as well as the spirit of the law.

It is strongly recommended that any consultant or agency commissioned to prepare a survey in consequence of Section 106 project review become familiar with federal preservation laws, rules, and regulations and that they fully understand their responsibilities within the compliance process.

Under current preservation legislation, the SHPO does not ultimately approve nor disapprove any federal undertaking; but rather, the SHPO role is one of providing information and opinions regarding the significance of properties, their eligibility for listing in the National Register of Historic Places, and on appropriate plans to avoid, minimize, or mitigate adverse project impact. In a sense, the SHPO is the state arm of the Advisory Council on Historic Preservation, and Office of Archaeology and Historic Preservation. Specific legal responsibilities of the SHPO are codified at 36 CFR 61.2 and 36 CFR 800.2 and Subpart B.

Consultant Qualifications

The general rationale behind specifying minimum qualifications for individuals and organizations that prepare cultural resources surveys is that the recognition and evaluation of the significance of archaeological and architectural properties -- that is, the assessment of their eligibility for listing in the National Register of Historic Places -- requires demonstrable professional training and experience. The following standards meet the published requirements of the Department of Interior (36 CFR 66[42 FR 5371-5383, Jan. 28, 1977]), and represent the minimum qualifications acceptable for principal investigators for review and compliance projects in the State of Tennessee. Sections of the qualifications have been adapted from guidelines issued by the Society for Professional Archaeologists.

General requirements (all compliance research):

(1) Graduate degree in archaeology, anthropology, history, architectural history, or closely related field; or equivalent training accepted for accreditation purposes by the Society of Professional Archaeologists.

(2) Demonstrated ability to carry research to completion, usually evidenced by timely completion of theses, research reports, or similar documents.

(3) Experience in archaeological or architectural research in the region where the project will be undertaken is usually desirable.

Specific Requirements; Phase I (reconnaissance level) survey projects

Reconnaissance level surveys cannot normally be used to demonstrate complete compliance with the National Historic Preservation Act. The intent of requirements codified at 36 CFR 800.4 is to provide for a determination of the presence or absence of National Register eligible properties. The purpose of a reconnaissance level survey is usually to determine if an intensive survey or testing is warranted. As such, it can be used by the federal agency or applicant in the early planning stages of the project. It may be appropriate as a preliminary step prior to initial consultation on the identification phase of the 106 process. (See Reporting Standards, page 4.) Consultants should explicitly inform agencies and applicants as clients of the phased nature of this type of research to avoid potential misunderstandings concerning the scope of services. Specific minimum requirements for persons conducting reconnaissance level survey are:

Archaeology: 24 weeks (6 months) of field experience under the supervision of a professional archaeologist, of which no more than 12 weeks (3 months) can be survey; 20 additional weeks (5 months) of field experience in a supervisory capacity; and, 8 weeks (2 months) of laboratory experience under the supervision of a professional archaeologist.

Architecture/History: 24 weeks (6 months) of field experience under the supervision of a professional in the area of identification and evaluation of historic properties; 20 additional weeks (5 months) of field experience in survey in a supervisory capacity.

Phase II (intensive survey/testing) projects

In most cases, a Phase II report will be used by agencies to support either consensus or formal determinations of eligibility for listing of sites in the National Register. If so used, it must contain a sufficient level of information to allow the SHPO and the federal agency to apply National Register criteria to all properties that may possess any potential for National Register eligibility (see 36 CFR 63 and associated guidelines).

<u>Archival Research</u>: At least one year of experience in documentary research, under the supervision of a professional researcher.

<u>Historical Archaeology</u>: At least one year of field and laboratory experience, including 24 weeks of field work and 8 weeks of laboratory work under the supervision of a professional historical archaeologist on sites and artifacts of an historical period, and 20 weeks in a supervisory capacity.

<u>Prehistoric Archaeology</u>: At least one year of field and laboratory experience, including 24 weeks of field work and 8 weeks of laboratory work under the supervision of a professional prehistoric archaeologist on sites and artifacts of a prehistoric period, and 20 weeks in a supervisory capacity.

<u>Architecture/History</u>: One year of field experience under the supervision of a professional in the area of identification and evaluation of historic properties; 20 additional weeks (5 months) of field experience in survey in a supervisory capacity.

For the purposes of this office's review of survey reports, each report must be prepared under the direction of a professional meeting the above qualifications as author or co-author. The qualified professional assumes responsibility for the quality and accuracy of results even though the field work may have been done by another person.

Reporting Standards and Guidelines

These requirements should in no way be interpreted to restrict the inclusion of any data or comments the consultant or agency deems important, but the specific report format should reasonably reflect an awareness of the following guidelines to insure comparability of research and the adequate documentation necessary to comply with the "Secretary of the Interior's Standards and Guidelines". Sections of these standards and guidelines have been adapted from "Standards and Guidelines for Quality Control in Archaeological Resource Management in the Southeastern United States" published by J.A. Bense, H.A. Davis, L. Heartfield, and K. Deagan in Southeastern Archaeology 5(1):52-62.

(1) Title Page. This page should include: (a) title of the report, including the name and location of project (ex. "Archaeological/Architectural Survey of the Proposed Jones Wastewater Treatment Facility Tract, Nashville, Davidson County"); (b) author(s)/principal investigator(s), institutional affiliation, address, and phone number; (c) name, address, and telephone number of the federal agency responsible for the project and for the applicant for federal funds, licenses, or permits for whom the report was prepared; (d) lead state/federal agency and contract/permit number(s); (e) date of report.

(2) Management Summary. This should not exceed one page and should contain the following information: (a) type of project and purpose of investigation; (b) summary of contents including research orientation, methodology, and conclusions; and (c) brief statement of significance and National Register eligibility in the opinion of the principal investigator(s) of any site, building, structure, object or district identified, (d) nature and degree of potential impact to National Register-eligible property(s), and recommendations

for mitigation of potential impacts. This summary will be used frequently by non-archaeologists, non-architects, and non-historians and should be written accordingly.

(3) Table of Contents.

(4) Introduction. This section should include (a) project sponsor, contract/permit numbers, and other agency specific information; (b) project description including geographic limits of project area and potential project impacts; (c) purpose of report and discussion of scope of work; (d) dates of investigation and staff composition; and (e) disposition (temporary and final) of field notes, photographs, artifacts, and other materials.

(5) Environment. This section should describe the present environment or setting of the project area and how the prehistoric or historic environment or setting may have differed from the contemporary environment or setting.

(6) Literature Review. This section should summarize the archaeological, architectural, and historical information obtained from literature searches. Its purpose is to provide a framework for previous culture periods and the course of historical development in the project area. Repositories consulted should be given (i.e. personal library, Tennessee Division of Archaeology Library, agency library, et cetera).

(7) Summary of Field Methods. This section should contain a detailed summation and evaluation of field techniques used during the survey, including sampling, surveying, and recording techniques. If the complete range of artifact types was not collected or all buildings were not surveyed, a rationale should be given for differential recovery methods. Note all constraints on investigation, including limitations of access, poor visibility, adverse weather conditions, et cetera. Include USGS maps showing the location of

survey transects and locations of subsurface tests and above-ground elements, as well as an estimation of the percentage of square mile surveyed.

(8) Summary of Laboratory and Analytical Methods (archaeological surveys only). Describe the classificatory/typological schemes used; means of chronological determination; and indicate where artifacts and records are to be curated. Include the accession numbers assigned to the materials obtained from each site.

(9) Results. Opinions concerning the National Register eligibility of all identified properties should be clearly stated. Negative finding reports -- that is, reports which conclude that no National Register-eligible or -listed resources were identified in the area of project impact -- should include a discussion of why resources may not have been located (previous disturbance, poor visibility, possibility for deeply buried sites, lack of accessibility, et cetera). All properties identified and evaluated as not NR eligible should be listed and described. Positive finding reports - that is, reports which conclude that National Register-eligible or -listed properties are contained within the area of project impact -- should list and describe each property in short narrative form using permanent State Site Numbers or Architectural Survey Form number. The boundaries of all properties identified as eligible should be depicted on maps or site plans. Boundary determinations should be based on National Register guidelines and should be justified in the report. For archaeological sites, enumerate and describe artifacts in tabular format, including illustrations of relevant diagnostic artifacts. For above-ground properties, describe principal features of the property which make it National Register-eligible and their current condition. Surveys using any form of subsurface investigation should include, at a minimum, a representative soil profile or profiles.

In discussing the National Register eligibility of properties archaeological significance must be stated in relation to the potential of the property to contribute information under National Register Criterion "D". The reason for concluding the site does or does not have this potential must be stated for each site. Specific research questions that can be addressed through further work on the site should be constructed, including references to previous scholarly investigations. The known and potential impacts to each specific site by the undertaking should be described in as much detail as possible. Architectural or historical significance must be stated in relation to the integrity of each property and its association with Criteria "A", "B", or "C".

(10) <u>Recommendations</u>. Explain fully any recommendations for future research on any property, referring to specific research questions that may be answered by further research. If the work performed is a Phase I survey, further work may include testing certain sites for eligibility--justifications must be specific concerning both further testing and avoiding further testing. If the work performed is a Phase II survey or testing project, recommendations for further work might include proposals for modifications to the proposed undertaking to avoide the site.

<u>Procedural Requirements</u>:

Archaeology

(A) <u>Consultation of Site Files</u>. Consultation of official site file repositories to identify previously recorded sites within the study area (repositories include the Tennessee Division of Archaeology, Pinson Mounds State Archaeological Area, the University of Tennessee at Knoxville, Middle Tennessee State University, the University of Tennessee at Chattanooga, and University of Memphis). Note: The central and most up-to-date repository is that maintained by the Tennessee Division of Archaeology.

(B) Completion of Tennessee Site Survey Forms. Official site survey forms should be obtained from the Site File Curator and submitted for assignment of state site numbers before submittal of draft or final reports. Reports containing field numbers or other designations are not acceptable.

(C) Submission of Draft Reports. One copy of the draft report should be submitted for review. For tracking purposes, reports should be submitted directly to Herbert L. Harper, Deputy SHPO, Tennessee Historical Commission, 2941 Lebanon Road, Nashville TN 37243-0442.

(C) Report distribution. A minimum of seven copies of the final survey reports should be submitted to the State Historic Preservation Officer for distribution to four designated repositories: (a) Tennessee Historical Commission; (b) Tennessee Division of Archaeology Library; (c) University of Tennessee Knoxville site file repository; (d) University of Memphis site file repository; (e) Pinson Mounds State Archaeological Area Library; (f) Middle Tennessee State University site file repository; and (f) University of Tennessee at Chattanooga site file repository.. Whether the report is sent directly by the consultant, or by the client or agency is at the latter's discretion.

(D) SHPO Contacts for Archaeological Matters. In the state of Tennessee, review and compliance responsibilities concerning archaeological matters are carried out under the supervision of the SHPO by the Tennessee Division of Archaeology, Department of Environment and Conservation. Questions regarding archaeological matters should be directed to the following individuals:

George (Nick) Fielder   State Archaeologist and Director

Jennifer Bartlett   Federal Programs Archaeologist

Suzanne Hoyal   Site File Curator

Telephone: (615) 741-1588-17

Address: Tennessee Division of Archaeology
5103 Edmondson Pike
Nashville, TN 37211

Architecture

(A) Consultation of SHPO Site Maps and Survey Files. SHPO site maps and survey files maintained by the THC should be consulted to identify previously recorded structures within the study area. Sites previously identified and included in the SHPO comprehensive statewide survey and inventory should be identified by the THC site inventory number in the report.

(B) Completion of Tennessee Historical Commission "Tennessee Historical and Architectural Resource Form". Official structure survey forms should be obtained from the Tennessee Historical Commission and used to record all previously unrecorded sites. These should be submitted with the draft or final report. Reports not containing survey forms for unrecorded properties are not acceptable.

(C) Submission of Draft Reports. One copy of the draft report should be submitted for review. For tracking purposes, reports should be submitted directly to Herbert L. Harper, Deputy SHPO, Tennessee Historical Commission, 2941 Lebanon Road, Nashville TN 37243-0442.

(D) Report distribution. A minimum of seven copies of the final survey report should be submitted to the State Historic Preservation Officer. Whether the report is sent directly by the consultant, or by the client or agency, is at the latter's discretion.

(E) SHPO Contacts for Architectural Matters. In the state of Tennessee, review and compliance responsibilities concerning all matters, but especially above-ground matters are carried out by the Tennessee Historical Commission. Questions should be directed to the following individuals:

Joe Garrison	Review and Compliance Coordinator
Claudette Stager	National Register Program
Steve Rogers	Survey

Telephone: (615) 532-1559

Address: Tennessee Historical Commission
2941 Lebanon Road
Nashville, TN 37243-0442